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8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 JUAN CARLOS MARTINEZ CASTRO, and  
SHANNON JEFFRIES,  
15 Defendants.  
16

CASE NO. 2:19-CR-00233-TLN

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: September 17, 2020  
TIME: 9:30 a.m.  
COURT: Hon. Troy L. Nunley

17 **STIPULATION**

- 18 1. By previous order, this matter was set for status on September 17, 2020.  
19 2. By this stipulation, the defendants now move to continue the status conference until  
20 December 17, 2020, at 9:30 a.m., and to exclude time between September 17, 2020, and December 17,  
21 2020, under Local Code T4.  
22 3. The parties agree and stipulate, and request that the Court find the following:  
23 a) Counsel for defendants desire additional time consult with their clients, review the  
24 discovery, conduct defense investigation and research, discuss potential resolution, and  
25 otherwise prepare for trial.  
26 b) Counsel for defendants believe that failure to grant the above-requested  
27 continuance would deny them the reasonable time necessary for effective preparation, taking into  
28 account the exercise of due diligence.

1 c) The government does not object to the continuance.

2 d) Based on the above-stated findings, the ends of justice served by continuing the  
3 case as requested outweigh the interest of the public and the defendant in a trial within the  
4 original date prescribed by the Speedy Trial Act.

5 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
6 et seq., within which trial must commence, the time period of September 17, 2020 to December  
7 17, 2020, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local  
8 Code T4] because it results from a continuance granted by the Court at defendant's request on  
9 the basis of the Court's finding that the ends of justice served by taking such action outweigh the  
10 best interest of the public and the defendant in a speedy trial.

11 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
12 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
13 must commence.

14 IT IS SO STIPULATED.

15  
16 Dated: September 9, 2020

McGREGOR W. SCOTT  
United States Attorney

17  
18 /s/ JUSTIN L. LEE  
JUSTIN L. LEE  
19 Assistant United States Attorney

20  
21 Dated: September 9, 2020

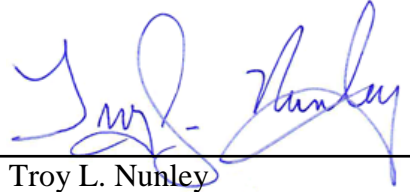
/s/ HANNAH LABAREE  
HANNAH LABAREE  
22 Counsel for Defendant  
JUAN CARLOS MARTINEZ CASTRO

23 Dated: September 9, 2020

/s/ CHRIS COSCA  
CHRIS COSCA  
24 Counsel for Defendant  
SHANNON JEFFRIES  
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**FINDINGS AND ORDER**

IT IS SO FOUND AND ORDERED this 9<sup>th</sup> day of September, 2020.



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Troy L. Nunley  
United States District Judge